


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

QUALCOMM INCORPORATED,)	
a Delaware corporation; and)	
QUALCOMM TECHNOLOGIES, INC.,)	
a Delaware corporation,)	
)	
Plaintiffs,)	C.A. No. 24-490 (MN)
)	
v.)	
)	
ARM HOLDINGS PLC., f/k/a ARM LTD.,)	
a U.K. corporation,)	REDACTED PUBLIC VERSION
)	
Defendant.)	

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OF DEFENDANT ARM'S
EXPERT OPINIONS AND TESTIMONY**

Pursuant to Federal Rule of Evidence 702, Plaintiffs Qualcomm Inc. and Qualcomm Technologies, Inc. (collectively, "Plaintiffs") move to exclude certain opinions of Defendant Arm Holdings plc, f/k/a Arm Ltd.'s experts Michael Brogioli, Steven Richards, Thomas Britven, and Timothy Simcoe.

The grounds for this motion are set forth in Plaintiffs' Opening Brief and accompanying papers, filed herewith.

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RULE 7.1.1 CERTIFICATION

Pursuant to D. Del. Local Rule 7.1.1, counsel for Plaintiffs met and conferred with counsel for Defendant regarding the relief sought by the foregoing motion, and Arm opposes this motion.

/s/ Jennifer Ying

Jennifer Ying (#5550)

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on October 24, 2025, upon the following in the manner indicated:

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[PROPOSED] ORDER

Having reviewed and considered Plaintiffs’ Motion to Exclude Certain Opinions and Testimony of Arm’s Experts Michael Brogioli, Steven Richards, Thomas Britven, and Timothy Simcoe under Fed. R. Evid. 702 and *Daubert* (“the Motion”), the related briefing and all arguments thereto:

IT IS HEREBY ORDERED that:

1. Plaintiffs’ Motion to exclude the opinions and testimony of Dr. Brogioli, Mr. Richards, Mr. Britven, and Professor Simcoe is hereby GRANTED.
2. Dr. Brogioli’s opinions regarding: (1) “Nuvia-based cores,” (2) CPU verification materials (OOBs and ACK patches) and support ([REDACTED]), (3) harm to Qualcomm from Arm’s withholding of CPU [REDACTED], (4) Arm’s [REDACTED] and the [REDACTED] being “significant technical improvements,” and (5) the performance of Arm implementation cores are hereby excluded. Dr. Brogioli

is precluded from providing testimony reflected in the following paragraphs of his September 5, 2025 report: ¶¶ 1-419.

3. Mr. Richards' opinions (1) that Qualcomm was required to disclose Arm's October 22, 2024 Letter in Qualcomm's 2024 SEC filings, (2) that Qualcomm's SEC disclosures do not convey the harm alleged in the Second Amended Complaint, and (3) regarding Qualcomm's state of mind are hereby excluded. Mr. Richards is precluded from providing testimony reflected in the following paragraphs of his September 5, 2025 report: ¶¶ 1-94.
4. Mr. Britven's opinions: (1) that Arm [REDACTED] [REDACTED] to Qualcomm for [REDACTED]; (2) that [REDACTED]; (3) that it was [REDACTED] [REDACTED]; and (4) regarding causation for changes in the business deal between Qualcomm and a third party, are hereby excluded. Mr. Britven is precluded from providing testimony reflected in the following paragraphs of his September 5, 2025 report: ¶¶ 17-18, 77-81, 109, 147-49, 151, 203, 209-15.
5. Professor Simcoe's opinions regarding the parties' intent or state of mind (or any interpretation thereof), speculation about future technical ecosystems or consumer behavior, or generalized assumptions about Arm's ecosystem and harm to Qualcomm based on total aggregate revenue and R&D expenditures are hereby excluded. Professor Simcoe is precluded from providing testimony reflected in the following paragraphs of his September 5, 2025 report: ¶¶ 56-62, 67-74, 82-86, 108, 120-26, 131-26, 141, 145-48, 150-61, 166-71, 212-26, 236-37.

It is SO ORDERED, this _____ day of _____ 2025.

The Honorable Maryellen Noreika
United States District Judge